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April 12, 2023

VIA ECF

Hon. Taryn A. Merkl
United States Magistrate Judge
United States District Court, E.D.N.Y.
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Allstate Insurance Company, et al. v. Isaac Shapson, et al.
Docket No. 22-cv-7125 (NRM)(TAM)

Dear Judge Merkl:

We represent Plaintiffs in the above-referenced matter and, jointly with counsel for Defendants Pervaiz Iqbal Qureshi, M.D., P.R. Medical, P.C., SD Medical P.C., Arkadiy Kiner, L.Ac., Gentle Care Acupuncture, P.C., Isaac Shapson, and Yuri Nisnevich a/k/a Yuri Nisnevich (the “Defendants”), respectfully request that the time for Defendants¹ to serve an answer or otherwise respond to the Complaint be extended up to and including May 12, 2023. The parties are engaged in productive settlement discussions and request this extension to continue the discussions and determine if a final agreement can be reached in the time requested. Accordingly, it is respectfully requested that the time for Defendants’ answer or response to the Complaint be extended up to and including May 12, 2023.

This is Plaintiffs and Defendants’ third and/or fourth request for an extension of time to file an answer or otherwise respond to the Complaint, with prior requests being made on January 17, 2023 (ECF No. 8), February 8, 2023 (ECF No. 17) and March 9, 2023 (ECF No. 31) for Defendants Qureshi, PR Medical and SD Medical; on January 18, 2023 (ECF No. 9) and March 9, 2023 (ECF No. 31) for Defendants Shapson and Nisnevich; and February 6, 2023 (ECF No. 16) and March 9, 2023 (ECF No. 31) for Defendants Kiner and Gentle Care Acupuncture. The requests were granted by orders dated January 17th, January 19th, February 7th, February 9th and March 20th of 2023.

¹ Defendants are collectively represented by Gary Tsirelman, P.C.

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Currently, Plaintiffs are in the process of completing the methods of alternate service as directed by this Court in its March 20, 2023 Order (ECF No. 33), which granted Plaintiffs' request for alternate service upon Defendants Timothy Morley, M.D., Sheldon Pike, M.D., and Joseph C. Yellin, D.O., and anticipate filing the proofs of service for the remaining individual defendants in advance of the Court's May 1, 2023 deadline. Accordingly, this application does not affect any current court deadlines.

We thank the Court for its consideration in this regard.

Respectfully submitted,

MORRISON MAHONEY LLP

By: /s/ James McKenney
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CC: All Counsel (Via ECF)